

MARION QUESENBERRY, State Bar No. 72308
RYNN & JANOWSKY, LLP
P.O. Box 20799
Oakland, CA 94620
Telephone: (510) 705-8894
Facsimile: (510) 705-8737
E-mail: marion@rjlaw.com

Attorneys for Plaintiffs
Berti Produce – San Francisco, Inc.; Edwin Chin
dba New City Fruit & Produce; Jacobs, Malcolm & Burt;
North Bay Produce, Inc.; Washington Vegetable Company;
What A Tomato Produce Company, Inc.; and Coosemans
San Francisco, Inc.

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

BERTI PRODUCE – SAN FRANCISCO,
INC.; EDWIN CHIN dba NEW CITY FRUIT
& PRODUCE; JACOBS, MALCOLM &
BURTT; NORTH BAY PRODUCE, INC.;
WASHINGTON VEGETABLE COMPANY;
WHAT A TOMATO PRODUCE COMPANY,
INC.; and COOSEMANS SAN FRANCISCO,
INC.,

Plaintiffs,

v.

ROBERT SBRAGIA; JOHN SBRAGIA;
STEVEN SBRAGIA; and PATRICIA CINI
aka PATTI CINI,

Defendants.

CASE NO. C11-03546 MEJ

**STIPULATION & REQUEST TO
EXTEND DEADLINE FOR ADR
SESSION, DISCOVERY, &
DISPOSITIVE MOTIONS**

Plaintiffs and Defendants respectfully request that the Court extend the deadline to hold an ADR session from May 24, 2012 to July 15, 2012. The parties scheduled a mediation session for May 15, 2012, but due to unforeseen business problems, one of the Plaintiffs was unable to attend the mediation, and therefore, it was cancelled. The parties are unable to reschedule the

LAW OFFICES
RYNN & JANOWSKY, LLP
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mediation before the deadline, as one of Defendants and their counsel are not available on the dates that the mediator has free. The parties will reschedule the mediation as soon as possible, and they have set a telephone conference with the mediator on May 29 to do so.

Counsel for both parties believe that mediation may be fruitful, and they would appreciate this extension to insure that the mediation session can take place.

Trial is not scheduled until March 4, 2013; however, three deadlines will be affected by the extension of the mediation deadline. As a result, the parties also respectfully request that (1) the close of discovery be extended from August 28, 2012 to September 28, 2012, (2) the dispositive filing, service, and noticing deadline for dispositive motions be extended from September 27, 2012 to October 27, 2012, and (3) the hearing date for dispositive motions be changed from November 1, 2012 to December 6, 2012 at 10:00 a.m.

The appointed mediator, Ellyn Lazarus, has been very helpful in moving this matter forward, and she agrees that this proposed extension would be beneficial to the parties.

Date: May 22, 2012

RYNN & JANOWSKY, LLP

By: /s/ Marion I. Quesenbery
Marion I. Quesenbery
Attorneys for Plaintiffs

Date: May 22, 2012

COHEN AND JACOBSON, LLP

By: _____
Lawrence A. Jacobson
Attorney for Defendants

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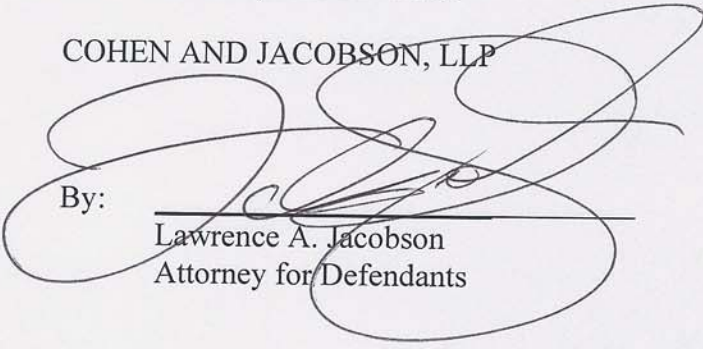
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RYNN & JANOWSKY, LLP

15 By: /s/ Marion I. Quesenbery
Marion I. Quesenbery
Attorneys for Plaintiffs

17 Date: May 22, 2012

COHEN AND JACOBSON, LLP

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19 By: 
Lawrence A. Jacobson
Attorney for Defendants
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1 **IT IS SO ORDERED.** The following deadlines and dates contained in the Case
2 Management Order dated February 24, 2012 are changed: (1) for the parties to complete ADR to
3 July 15, 2012, (2) for the close of discovery to September 28, 2012, (3) for filing, service, and
4 noticing dispositive motions to October 27, 2012, and (4) for the hearing date for dispositive
5 motions be changed from November 1, 2012 to December 6, 2012 at 10:00 a.m.

6 Date: May 29, 2012

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9 Chief Magistrate Judge Maria-Elena James
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